

IN THE UNITED STATES DISTRICT COURT  
FOR THE NORTHERN DISTRICT OF ILLINOIS  
EASTERN DIVISION

|                                       |   |                               |
|---------------------------------------|---|-------------------------------|
| THE HOTEL EMPLOYEES AND RESTAURANT    | ) |                               |
| EMPLOYEES INTERNATIONAL UNION WELFARE | ) |                               |
| FUND, <i>et al.</i> ,                 | ) |                               |
|                                       | ) | CIVIL ACTION                  |
| Plaintiffs,                           | ) |                               |
|                                       | ) | NO. 10 C 7851                 |
| vs.                                   | ) |                               |
|                                       | ) | JUDGE CHARLES R. NORGLER, SR. |
| THE PITTSBURGH ATHLETIC ASSOCIATION,  | ) |                               |
|                                       | ) |                               |
| Defendant.                            | ) |                               |

**MOTION FOR ENTRY OF DEFAULT AND JUDGMENT**

NOW COME Plaintiffs, by their attorneys, and move for entry of judgment by default against Defendant, THE PITTSBURGH ATHLETIC ASSOCIATION, in the total amount of \$133,941.63, plus Plaintiffs' court costs and reasonable attorneys' fees in the amount of \$1,130.00.

On December 30, 2010, the Summons and Complaint was served on an agent of Defendant (by tendering a copy of said documents to Art Gallagher, Manager) at its place of business (a copy of the Summons and Affidavit of Service is attached hereto). Therefore, Defendant's answer was due on January 20, 2011. As Defendant has failed to timely answer the Complaint, Plaintiffs respectfully request entry of default and judgment.

/s/ Laura M. Finnegan

**CERTIFICATE OF SERVICE**

The undersigned, an attorney of record, hereby certifies that she electronically filed the foregoing document (Motion for Entry of Default and Judgment) with the Clerk of Court using the CM/ECF system, and further certifies that I have mailed the above-referenced document by United States Mail to the following non-CM/ECF participant on or before the hour of 5:00 p.m. this 25th day of February 2011:

The Pittsburgh Athletic Association  
4215 Fifth Avenue  
Pittsburgh, PA 15213

/s/ Laura M. Finnegan

Laura M. Finnegan  
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